

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
NEWARK DIVISION**

In the Matter of C.G. _____)

Emeric Gerval, _____)

Petitioner, _____)

v. _____)

Niurka Gonzalez, _____)

Respondent. _____)

Case No. 17-cv-12179(SDW)(LDW)

MOTION FOR ADMISSION *PRO HAC VICE* OF RICHARD MIN

Robert D. Arenstein, Esq. (“Movant”), a member in good standing of the Bar of this Court, and attorney for Petitioner, Emeric Gerval, hereby moves the Court to enter an order permitting Richard Min, Esq. (the “Applicant” or “Mr. Min”), to be admitted *pro hac vice* before this Court to provide representation to the Petitioner, Emeric Gerval, pursuant to Local Rule 101.1. In support of the Motion, Movant and Applicant certify as follows pursuant to Local Rule 101.1(c):

1. Mr. Min is a Partner in the law firm of Camhi & Min LLC and his practice is entirely devoted to Family Law.

2. Mr. Min’s contact information is as follows: Camhi & Min LLC, 420 Lexington Avenue, Suite 300, New York, NY 10170, (212) 297-6114 (tel.), (212) 479-2521 (fax); rmin@cmlawny.com.

3. The Petitioner, Emeric Gerval, is pursuing this case under the 1980 Hague Convention on the Civil Aspects of International Child Abduction. The Petitioner is the left-

behind parent in this case and is located in France.

4. Applicant's practice includes a focus on handling Hague Abduction Convention cases in various jurisdictions in the United States of America and he is accustomed to working with left-behind parents located abroad.

5. Mr. Min is a member in good standing in the bar of the courts of the State of New York where he was admitted in 2008. Mr. Min is also a member in good standing of the United States District Courts for the Southern and Eastern Districts of New York, where he was admitted in 2011 and 2012, respectively. Mr. Min is also a member in good standing of the Second Circuit and Ninth Circuit Courts of Appeal, where he was admitted in 2014 and 2016, respectively.

6. Mr. Min is not under suspension or disbarment by any court, there are no disciplinary proceedings are pending against Mr. Min in any jurisdiction, and no discipline has previously been imposed on Mr. Min in any jurisdiction.

7. Mr. Min is ineligible for admission to the bar of this Court under L.Civ.R. 101.1(b) because he is not licensed to practice in the State of New Jersey.

8. Mr. Min understands that if this Court grants this motion to appear *pro hac vice*, Mr. Min must make a payment to the New Jersey Lawyers' Fund for Client Protection as provided by New Jersey Court Rule 1:28-2(a). Mr. Cullen understands that this payment shall be made for any year in which he continues to represent a client in a matter pending in this Court, and that a copy of the order shall be forwarded by the Clerk to the Treasurer of the Fund.

9. Mr. Min understands that if this Court grants this motion to appear *pro hac vice*, Mr. Min must make a payment of \$150.00 to this Court, payable to the Clerk, USDC.

10. Mr. Min understands that, an appearance as counsel of record shall be filed

promptly by a member of the bar of this Court upon whom all notices, orders and pleadings may be served, and who shall promptly notify his or her specially admitted associate of their receipt. Mr. Min further understands that only an attorney at law of this Court may file papers, enter appearances for parties, sign stipulations, or sign and receive payments on judgments, decrees or orders. Mr. Min further understands that a lawyer admitted *pro hac vice* is deemed to have agreed to take no fee in any tort case in excess of New Jersey Court Rule 1:21-7 governing contingent fees.

11. The undersigned Movant has already filed an appearance as counsel of record in this matter.

12. Mr. Min understands that a lawyer admitted *pro hac vice* is within the disciplinary jurisdiction of this Court.

WHEREFORE, Robert D. Arenstein, Esq., moves this Court to enter an Order for Richard Min, Esq. to appear *pro hac vice* before this Court on behalf of Petitioner, Emeric Gerval, for all purposes relating to the proceedings in the above-styled matter and directing the Clerk to provide notice of electronic filings to Richard Min, Esq.

Respectfully Submitted,



/s/ Robert D. Arenstein

Robert D. Arenstein, Esq.

Attorney for Petitioner

691 Cedar Lane

Teaneck, New Jersey 07666

Tel: (201) 259-1081

Fax: (772) 679-3997

VERIFICATION

I HEREBY CERTIFY UNDER THE PENALTIES OF PERJURY AND UPON PERSONAL KNOWLEDGE THAT THE CONTENTS OF THE FOREGOING PAPER ARE TRUE AND CORRECT.

Dated: February 14, 2018

Richard Min

Richard Min